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May 30, 2025

Via CM/ECF and Email

Hon. Margaret M. Garnett
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007
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Re: Barth v. Houghton Mifflin Company et al.
No. 1:25-cv-01777-MMG

Dear Judge Garnett:

This firm represents Defendants HarperCollins Publishers, L.L.C. (“HarperCollins”), News Corp, Shelly Barth, Shelly R. Barth Revocable Trust, and the Estate of John Barth (“Defendants”) in the above-captioned *pro se* action. We write this letter motion for leave to file redacted and sealed versions of Defendants’ letter motions (1) for a conference and (2) to postpone submission of the proposed case management order (currently due on June 3, 2025).

For the avoidance of any doubt, as previously argued in Defendants’ opposition to Mr. Barth’s motion to seal, Defendants believe that there is no cause to seal *any* of the documents that Mr. Barth has filed in this action. (ECF No. 50-52.) But because the Complaint, its accompanying appendices, and Mr. Barth’s so-called “memorandum of law” with which he commenced this action, are still provisionally sealed, out of an abundance of caution we are filing Defendants’ letter motions in redacted form so that any direct references to the contents of



May 30, 2025
Page 2

Mr. Barth's currently sealed pleadings are not public facing (*i.e.*, until such time as the Complaint is unsealed).

As Defendants have previously argued, Defendants request that the Court unseal the pleadings and direct Mr. Barth to cease filing any further documents under seal absent good cause shown. While we are making the instant application out of an abundance of caution, Defendants note it is the second time that we have had to file redacted and sealed versions of our submissions to the Court. Defendants respectfully submit that the Court consider shifting costs to Mr. Barth as a consequence of these unnecessary applications to file papers in redacted and sealed form.

Respectfully submitted,

/s/ **Steven G. Mintz**

Steven G. Mintz

cc: John S. Barth, Jr.
Plaintiff Pro Se (Via ECF)